

3. I make this affirmation in order to inform the Court of the conditions at Parchman, to further support the Complaint in this matter.

4. The situation at the prison has become a crisis. The inmates are being denied basic human needs, and authorities have not been able to prevent several recent violent murders among the inmates. If this is not corrected as soon as possible, further lives will be lost as a direct result of the dangerous and unhealthy conditions.

5. Guards have been neglecting and actively abusing the prisoners, In terms of specific misconduct by guards at Parchman, including abuse against inmates directly and other unsafe or improper behavior, I have personally observed the following incidents:

- CO OPENING DOORS OF CELL & GETTING INMATES INTO OTHER CELL TO BEAT UP ANOTHER INMATES, TWO - THREE TIMES. THE CO BOYFRIEND IS AN INMATE
- CO SHOWING FAVORITISM TO INMATE BOYFRIENDS TO LET THEM OUT OF THE CELL
- CO LET THE FOOD SIT OUT FOR HOURS & WONT SERVE
- CO NOT ON POST IN THE TOWER BUT IN THE HALLWAY.

6. Parchman is also critically understaffed. To my knowledge, there are currently 5 correctional officers guarding the unit where I am incarcerated, overseeing 160 inmates.

There are not enough guards to keep prisoners safe, which has made possible the series of killings that have taken place – including the murders by stabbing of [REDACTED], [REDACTED]

[REDACTED] "NO G" [REDACTED] n, Denorris Howell between January 1 and 3, 2020. Because I have observed these and other numerous acts of misconduct and violence between prisoners, as described in this affirmation, I believe that this number of guards is not sufficient to keep inmates reasonably safe.

//

NICK
NAME

7. I personally fear for my life and safety, because in my experience, the number of guards in my unit is not enough to prevent violence.

8. I have personally observed the following with regard to the lack of correctional officers and other staff here at Parchman:

• HE SAID THAT DENORRIS HOWELL BEAT OUT BECAUSE THE GUARDS DID NOT HELP HIM.

9. Because of the lack of sufficient security, violence among the inmates is common and the small staff of correctional officers is not able to prevent it. I have personally witnessed or experienced the following violent episodes:

• GUARDS ONLY DO SECURITY CHECKS ONLY [REDACTED] ONCE A TOUR WHICH ARE 12 HOURS, SO IF YOU NEED ASSISTANCE THE GUARDS ARE NOT AROUND.

• ON WEEKENDS SOMETIMES ONLY 1 GUARD ON DUTY FOR 80 INMATES IN ONE ZONE & THE OTHER ZONE 80.

• ON JANUARY 6, 2020 HE OBSERVED INMATES KILL EACH OTHER & THE GUARDS DELAYED COMING. GUARD PULLED GUN HIM ON

10. Food is often contaminated and not fit for human consumption. [REDACTED]

[REDACTED] and other inmates have had to eat food from trays that were tainted by rat

and bird excrement.

3. I make this affirmation in order to inform the Court of the conditions at Parchman, to further support the Complaint in this matter.

4. The situation at the prison has become a crisis. The inmates are being denied basic human needs, and authorities have not been able to prevent several recent violent murders among the inmates. If this is not corrected as soon as possible, further lives will be lost as a direct result of the dangerous and unhealthy conditions.

5. Guards have been neglecting and actively abusing the prisoners. In terms of specific misconduct by guards at Parchman, including abuse against inmates directly and other unsafe or improper behavior, I have personally observed the following incidents:

- I PERSONALLY OBSERVED CO HANGING OVER LAMPS TO INMATES DURING THE RIOTS IN THE BEGINNING OF JAN 2020.
- I PERSONALLY OBSERVED CO DURING THE RIOTS NOT PROVIDE AID TO INMATES WHO WERE STABBED

6. Parchman is also critically understaffed. To my knowledge, there are currently 29 correctional officers guarding the unit where I am incarcerated, overseeing 150 inmates.

There are not enough guards to keep prisoners safe, which has made possible the series of killings that have taken place – including the murders by stabbing of ~~Walter Gates, Denorris~~ ~~Hollman~~, Denorris Howell between January 1 and 3, 2020. Because I have observed these and other numerous acts of misconduct and violence between prisoners, as described in this affirmation, I believe that this number of guards is not sufficient to keep inmates reasonably safe.

THE GUARDS LEFT DENORRIS HOWELL IN HIS CELL FROM 2:30 AM UNTIL NOW ~~THEY~~ ~~AND NO ONE HEARD HIM~~ EVEN THOUGH THEY REMOVED HIS ~~CELL~~ AT 3:00 AM.
CECUMATE

7. I personally fear for my life and safety, because in my experience, the number of guards in my unit is not enough to prevent violence.

8. I have personally observed the following with regard to the lack of correctional officers and other staff here at Parchman:

" SINCE THE PRISONS ARE PERSONAL ~~BEEN~~ BEEN WINGS WERE REMOVED I HAVE REQUESTED GUARDS FOR CLOTHES SOAP, WATER, TISSUES AT LEAST 6 TIMES.

9. Because of the lack of sufficient security, violence among the inmates is common and the small staff of correctional officers is not able to prevent it. I have personally witnessed or experienced the following violent episodes:

ON TWO DIFFERENT OCCASIONS I OBSERVED INMATES FIGHTING I REQUESTING GUARDS FOR ASSISTANCE & THEY IGNORED THE INMATES

10. Food is often contaminated and not fit for human consumption. For example, since SPANZU, I and other inmates have had to eat food from trays that were tainted by rat and bird excrement.

THE FOOD IS NOT COOKED AND COLD.

CATEGORIES OF CONCERN:

1. UNDERSTAFFING:

Parchman is critically understaffed. To my knowledge, there are currently 1[~] correctional officers guarding the unit where I am incarcerated, overseeing 152 inmates. I have personally witnessed or experienced the following with regard to the lack of correctional officers and other staff here at Parchman:

Are most guards female? Yes

Safety issues because of understaffing? Yes

Fear for life and safety? Yes

Lack of security and resources leading to violence? No security cameras on our building work.

Do guards come in Building? Officers are supposed to hand out trays to make sure prisoners get trays. Instead, they let the gang affiliated members do this.

8. Other problems and incidents I have personally observed or experienced

(that I want to include at this time) are: (guard issues, abuse, other) The gang members will infiltrate a cell, tie him to a wrack, request money from the tied up inmate's family. The victim's family will call security, and no one answers the phone. The guards have been warned prior if the money doesn't come in, I have witnessed victims being beaten and stabbed.

9. My fellow inmates and I are asking that the federal judge please come to see the conditions in EVERY BUILDING of Unit 29 and talk to the inmates directly. If I

could, I would tell the judge the following: Since November, we have made Commissary four times. We have been deprived of hygiene. I have not been outside for 9 months. It is not right the way they are treating us. I would swear to this in front of a judge in a Court of law.

The foregoing statements are true and correct to the best of my knowledge, information and belief. I hereby affirm under penalty of perjury as follows:

Jonathan J. Ham
PRINT

Jonathan J. Ham
SIGN

1/29/20 4:03
DATE TIME

J. H.
Initials

CLIENT INTERVIEW FORM

MDOC NO. 124724FULL NAME: Lemartine TaylorNICKNAME: N/AUNIT: 29 BUILDING: G ZONE: A

INTERVIEW NOTES:

1. I have been incarcerated at Parchman since October 2019 and been on lockdown.
2. I was incarcerated in the following Units at the following times:

Unit No.	Building	Zone	Start Date	Transfer Date	Inmates Per Cell
Current	<u>29</u>	<u>G</u>	<u>A</u>	<u>Oct. 2019</u>	
Prior					
Prior					
Prior					

3. The current condition of my cell (include details regarding power, water, mold, rats, sewage, busted plumbing, broken windows, etc.) is:

A couple of weeks ago, No water at all. Roaches are very bad. They have crawled on me. For 1.5-2 weeks the toilet did not work and I had to defecate in a plastic bag. Screen on my window so I can't see window - No Sunlight. No heat since got here.

L.T.
Initial Here

CATEGORIES OF CONCERN:

1. UNDERSTAFFING:

Parchman is critically understaffed. To my knowledge, there are currently 1 correctional officers guarding the unit where I am incarcerated, overseeing 80 inmates. I have personally witnessed or experienced the following with regard to the lack of correctional officers and other staff here at Parchman:

Are most guards female? Yes

Safety issues because of understaffing? Yes

Fear for life and safety? No

Lack of security and resources leading to violence? They show favoritism

Do guards come in Building? Every once in a while -
After they come in, they don't come back
Over a day, they might come in twice
for a few minutes.

2. FOOD:

Food is often contaminated and not fit for human consumption. I have personally witnessed or experienced the following problems with food (including times when it was late or unfit for consumption):

Food containing (circle all that apply): rat excrement, bird droppings, rocks, insects, rats, other _____.

Meals Late or Meals skipped entirely? Late - yes - Twice since been

Cold and often spoiled?

here, only fed twice in one day - skipped lunch -

How is food delivered?

Meat products look undercooked & has been sitting out - T-ham.

Inmates bring food in - different inmates do it.

Inmate let out to get cart w/ food. -

Some guys are out giving a tray. Some trays are missing things - Leads to fighting.

Food is always cold - Have not had a hot meal since I've been here.

3. **WATER:**

When running water is available at all, it is contaminated. It is brown in color.

Does it have sewage? Possibly

I compared it bottled water and it doesn't look right. Particles floating in it.

Do sinks have water? Today it does.

Toilets? Can it flush? All tied together? Raw sewage on floor?

Has been working for about 5 days - Was not working prior to that - would not flush at all -

I have experienced about 14 days during which running water is not available.

Describe.

The last time I was allowed to shower was on Wednesday 1/29. Before that,

the last time I was allowed to shower was on Christmas Day.

Shower cell started this Monday -

Was running down w/ bottled water - Given 4 bottles/day.

There are no laundry facilities available for inmates. To wash my clothes, I have

to: Only way is since water has been back on.

They don't come around & get dirty laundry.

Anything else? During my incarceration I have personally witnessed or experienced the following additional instances of unsanitary or unhealthy conditions:

Unable to brush teeth & wash face - doesn't feel right doing it the way we have to.

4. **RATS, COCKROACHES:**

Beds? Food? Cantine? Where? How many? Describe.

Yes | No

Yes - roaches - If you don't eat when it first comes in, roaches get on it immediately.

5. **BLACK MOLD:** I have seen black mold in the following places:

Walls in cells? ~~Yes~~

Rain comes through ceiling? - Yes, when it rains hard - comes down the wall -

Showers? - On wall + ceiling - Floorboards when come in -

Sinks? They don't clean the showers - Can catch things
on this -

Others?

Have
to use a
tower or
shot if I
have one to
stop it.

6. **MEDICAL:** Some of my current medical needs and problems are: None

Sick Calls? Responses? Missing medicine? Injured inmates? Too scared to take
Drunk in mid-Nov
started in arm -
Officer saw and left.

When something happens, you have to fill out a form
 & they will call you in 2-3 days - may be gone -
 I have experienced or observed the following incidents where prison officials
 refused to provide medical treatment for inmates:

A couple of days ago, an inmate
 fell out & the CO's refused to
 come in - Took 10-15 minutes -
 Thought they were playing around -
 Had passed out earlier that day -

have to
 pay 6 bucks
 to give a
 note -

Took
 medical 30-45
 minutes to
 get there,
 & the inmate
 died -
 "Black Nine"
 nickname

Fires? To signal guards?

Yes - Two weeks ago, diabetic
 inmate - power off, water off -
 needed insulin - Finally came
 after 25 minutes. Whole zone was smoked out -
 Black stuff in nose.

7. I (circle one) DID or DID NOT personally know the people who have died
 at Parchman since in the last few weeks. (Details, if any.)

Black Nine - > Nicknames
 Magic

8. Other problems and incidents I have personally observed or experienced (that I want to include at this time) are: (guard issues, abuse, other)

Air vents are full of dust.

9. My fellow inmates and I are asking that the federal judge please come to see the conditions in EVERY BUILDING of Unit 29 and talk to the inmates directly. If I could, I would tell the judge the following:

Its terrible - If stelf would come around every once in a while, it would better - People have been left hanging in their cells - We need better living conditions - Brown spots on the wall - Does not look like the interview area.

The foregoing statements are true and correct to the best of my knowledge, information and belief. I hereby affirm under penalty of perjury as follows:

Lemartine Taylor
PRINT

L. Martine Taylor
SIGN

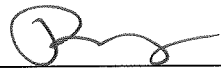
11/21/20 12:55
DATE TIME

LT
Initials

Digital Recorder Number: 12

Interviewer 1:

Preston Lee
PRINT


SIGN

1/31/20 1:03
DATE TIME

Interviewer 2:

Colleen Welch
PRINT


SIGN

1.31.19 12:10 - 1:00
DATE TIME

Witnessed

Brian Suprenant

BS
1/30/2020 _____